ROBERT L. BROWN III

ATTORNEY AT LAW
1005 SOUTH MAIN STREET
CORBIN, KENTUCKY 40701

(606) 528-3073 FAX (606) 528-3289 September 14, 2005

VIA FACSIMILE AND MAIL

Public Service Commission Ms. Beth O'Donnell Executive Director 211 Sower Blvd. P.O. Box 615 Frankfort, KY 40602 SEP 1 5 2005

PLANTIC SERVICE
COMMISSION

RE: ENTRY OF APPEARANCE AND MOTION FOR AN EXTENSION

OF TIME CASE NUMBER 2005-00319

Dear Ms. O'Donnell:

Enclosed please find an original and ten (10) copies of an Entry of Appearance and Motion for an Extension of Time as it relates to the above-mentioned matter. Please file the same at your earliest convenience.

Should you have any questions concerning this matter, please do not hesitate to contact me.

Sincerely,

Robert L. Brown III

RLB/ca

Enclosures

COMMONWEALTH OF KENTUCKY BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

SEP 1 5 2005

NOTICE OF GAS COST ADJUSTMENT FILING OF CITIPOWER, LLC.

CASE NO. 2005-00319

ENTRY OF APPEARANCE AND MOTION FOR AN EXTENSION OF TIME

Comes the now the undersigned attorney, Robert L. Brown III, and hereby makes his entry of appearance generally as counsel of record for Citipower, LLC.

Further, Citipower, LLC, by and through its undersigned attorney respectfully requests an extension of time to address the issues raised in the Public Service Commission Staff's First Data Request of Commission Staff to Citipower, LLC. The undersigned attorney would state that he has just recently received this data request and has had insufficient time to respond, and further states that he will be out of the office starting September 21, 2005, until October 5, 2005. Based upon this, the undersigned would request an extension of time within which to reply to the Commission's request until October 15, 2005.

Respectfully Submitted,

Robert L. Brown III

1005 South Main Street, Suite 101

Corbin, Kentucky 40701 Telephone: (606) 528-3073

CERTIFICATE OF SERVICE:

I hereby certify that the foregoing Motion was served by faxing a copy and by and mailing the original and ten copies thereof, postage prepaid, this 14th day of September, 2005, to the following:

Ms. Beth O'Donnell Executive Director Public Service Commission 211 Sower Blvd. P.O. Box 615

Frankfort, KY 40602

Robert L. Brown III